

Subject: FW: Confidentiality Designations -- Amos v. Lampo
Date: Friday, September 8, 2023 at 2:12:38 PM Central Daylight Time
From: Jonathan Street
To: Emily
Attachments: image001.png, image002.png

EXHIBIT

A

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From: Leslie Goff Sanders <lsanders@bartonesq.com>
Date: Thursday, July 27, 2023 at 6:25 PM
To: Jonathan Street <street@eclaw.com>, Lauren Irwin <lauren@eclaw.com>
Cc: Daniel Crowell <dcrowell@bartonesq.com>
Subject: RE: Confidentiality Designations -- Amos v. Lampo

Jon – We'll send any designations of Ramsey transcript tomorrow. We still haven't received the second Lopez deposition transcript. No idea why court reporter hasn't finished it but we've inquired several times. We were promised it today but still haven't seen it. We can set a meeting time on Tuesday morning if that works for you. I'll go through each of your objections by then (reserving Lopez if it still isn't in by then) and provide a rationale by Monday evening. Let me know if Tuesday works for you.

Leslie Goff Sanders

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From: Jonathan Street <street@eclaw.com>
Sent: Thursday, July 27, 2023 6:22 PM
To: Leslie Goff Sanders <lsanders@bartonesq.com>; Lauren Irwin <lauren@eclaw.com>
Cc: Daniel Crowell <dcrowell@bartonesq.com>

Subject: Re: Confidentiality Designations -- Amos v. Lampo

Leslie

I will not be available from next wednesday until august 16th. I have not received any designation log of the Ramsey transcript you claim is confidential so I am assuming you do not claim any of it is confidential. We dispute any of it as being marked confidential regardless.

If we need to meet in person before you file for a protective order, we need to do it before next Wednesday.

I will also need to know the rationale and legal argument behind your designations before we meet or the meeting will not be in good faith as required by the court.

Just let me know.

Thanks

Jon

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From: Leslie Goff Sanders <lsanders@bartonesq.com>
Sent: Thursday, July 13, 2023 5:34:05 PM
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Cc: Daniel Crowell <dcrowell@bartonesq.com>
Subject: Re: Confidentiality Designations -- Amos v. Lampo

Yes - we are on the same page. The grace period will extend until we have our face to face meeting which we will only do once.

Leslie Goff Sanders

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Cc: Daniel Crowell <dcrowell@bartonesq.com>
Subject: Re: Confidentiality Designations -- Amos v. Lampo

I want to make sure I understand.

You still will provide designations of confidential in depositions within 14 days of receipt, we will just hold off on meeting in person (if required) so that we can have one face to face instead of multiple ones.

Nothing in the deadlines in the protective order will have changed other than defendants will file for any protective order within 21 days after receipt of the last deposition.

Let me know if my understanding is incorrect.

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Subject: RE: Confidentiality Designations -- Amos v. Lampo

Yes – we'll send one list addressing each of them. Thanks.

Leslie Goff Sanders

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Cc: Daniel Crowell <dcrowell@bartonesq.com>
Subject: Re: Confidentiality Designations -- Amos v. Lampo

That's fine.

I'd just ask you let me know as soon as possible and before we meet why you think the designations meet the standard for a protective order so our meeting will not be a waste of time.

Thanks

Jon

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From: Leslie Goff Sanders <lsanders@bartonesq.com>
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Subject: Confidentiality Designations -- Amos v. Lampo

Jon – Per the Confidentiality Order (Doc. 42), we are required to follow the discovery dispute process for disputes re: confidentiality designations. You have disputed designations in the depositions of Luke LeFevre, David DiCicco and JB Waggoner. We have not yet made designations for Galloway or Ramsey now that we have the official transcript. We still do not have the deposition transcript of Lopez No. 2.

By my calculation, we have to meet re: the dispute over LeFevre designations by tomorrow. Rather than individual meetings to discuss the designations for each deposition, I think it would be more efficient to meet one time and discuss all of them. Would you agree to an extension of the grace period until 21 days following receipt of the last transcript (Lopez No. 2)? That would give us time to make any designations, you to review and challenge and then time to schedule a meeting to discuss all disputed designations before requesting a conference with the Court. It would also give enough time to get this resolved before your

response to our summary judgment motion is due, assuming the court reporter gets the Lopez transcript soon (which I'm sure she will – it's been a while).

Thanks.

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